

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

HENRY NARANJO and
MARLENE RAMIREZ,

Plaintiffs,

Vs.

STEPHEN BYRONS SMITH
and PALMER JOHNSON, INC.

Defendants.

CASE NO.: 00-6022-CIV-LENARD
MAGISTRATE: JUDGE TURNOFF

01 JUN 22 11 10 AM '01
U.S. DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI

PLAINTIFFS' RE-NOTICE OF TAKING DEPOSITION DUCÉ TECUM

TO: F. David Famulari, Esq.
Co-Counsel for Plaintiffs
Blank & Perry, P.A.
5730 S.W. 74th Street, Suite 700
Miami, Florida 33143
Tel: (305) 663-0177
Fax: (305) 663-0146

Frank J. Sioli, Esq.
Attorneys for PALMER JOHNSON, INC.
VALLE & CRAIG, P.A.
80 SW 8th Street, Suite 2520
Miami, Florida 33130
Tel: (305) 373-2888
Fax: (305) 373-2889

David L. Weber, Esq.
Co-Counsel for PALMER JOHNSON, INC.
Pinkert Law Firm LLP
454 Kentucky Street
P.O. Box 89
Sturgeon Bay, WI 54235
Tel: (920) 743-6505
Fax: (920) 743-2041

John D. Kallen, Esq.
BADIAK, WILL & KALLEN
Attorneys for STEPHEN BYRON SMITH
17071 West Dixie Highway
North Miami Beach, FL 33160
Tel: (305) 945-1851
Fax: (305) 944-8780

TAKE NOTICE that the undersigned attorneys will take the deposition of:

Name & Address: Corporate Representative(s) and/or Records Custodian of
Bradford Marine, Inc. with the most knowledge as to the
following documents and areas of inquiry listed below

Date & Time : Thursday, February 8, 2001 at 1:00 p.m.

Place : RIVKIND & PEDRAZA, P.A.
Sixth Floor, Concord Building
66 West Flagler Street
Miami, Florida 33130

Handwritten signature

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Pursuant to Rule 30, Federal Rules of Civil Procedure, the witness is requested to bring with him/her or produce at this deposition the following described material, documents, and records:

Areas of inquiry and documents Deponent(s) is/are to bring to said deposition are as follows:

1. All documents reflecting any and all repairs, modifications, alterations, changes, change orders and maintenance of the motor yacht SOUVENIR **before the explosion of July 1997.**
2. All documents reflecting any and all repairs, modifications, alterations, structural changes, cosmetic changes, change orders and maintenance of the motor yacht SOUVENIR **after the explosion of July 1997.**
3. All documents reflecting any and all repairs, modifications, alterations, structural changes, cosmetic changes, change orders and maintenance of the motor yacht SOUVENIR **as a result of the explosion of July 1997.**
4. All gas free certificates for the motor yacht SOUVENIR.
5. All diagrams, sketches, blueprints, schematics naval architect prints, plans, elevation plans, wiring plans, bilge plans, exhaust system plans, fuel system plans and all other documents depicting the motor yacht and its structure for both before and after the explosion.
6. All repairs, alterations and maintenance records for the motor yacht SOUVENIR.
7. All contracts for repairs, alterations and maintenance, all bills, invoices, parts inventories, materials used inventory for the motor yacht SOUVENIR.
8. The cause of explosion and all actions taken to prevent said explosion.
9. All actions taken and work done prior to the explosion on the motor yacht SOUVENIR.
10. Any and all documents, photographs, videos, etc. responsive to the Request for Production directed to Bradford Marine, and attached to the October 23, 2000 directed to Shawn B. McKamey, Esq., counsel for Bradford Marine.
11. Legible copies of all invoices, parts, inventories, letters, faxes, instructions, labor inventories, purchase inventories, material inventories, work orders, invoices, bills for services rendered and work performed, work proposals, change orders,

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Captain's instructions, blue prints, sketches, drawings for all work performed as they pertain to Stephen Byron Smith and/or the motor yacht SOUVENIR formerly KEVALI, account number #02847, including all photographs.

12. Produce legible complete copies of employee, Henry Naranjo, file and files containing payroll records and earnings while employed at Bradford Marine.

Upon oral examination pursuant to Rule 30, Federal Rules of Civil Procedure, before Mocega & Associates, court reporters, or any other Notary Public or officer authorized by law to take depositions in the State of Florida. The oral examination will be recorded stenographically and continue from day to day until completed. The deposition will be taken for the purpose of discovery, for use at trial, or for such other purposes as are permitted under the Federal Rules of Civil Procedure.

Respectfully Submitted,

RIVKIND & PEDRAZA, P.A.
Attorneys for Plaintiffs
Concord Building, Sixth Floor
66 West Flagler Street
Miami, Florida 33130
Telephone: (305) 374-0565

By: 

MANUEL VALDES, ESQ.


Fla. Bar No.: 13307

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been mailed on this 19th day of January, 2001 to all the above named attorneys on record.

RIVKIND & PEDRAZA, P.A.
Attorneys for Plaintiffs
Concord Building, Sixth Floor
66 West Flagler Street
Miami, Florida 33130
Telephone: (305) 374-0565
Facsimile : (305) 539-8341

By: 
MANUEL VALDES, ESQ.
Fla. Bar No.: 13307

cc: Mocega & Associates
25 S.E. 2nd Avenue, Suite #543
Miami, Florida 33131
Tel: (305) 374-0181
Fax: (305) 374-4169